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Securities Arbitration Law Group, PLLC

December 12, 2024

VIA DR PORTAL & EMAIL

Ms. Felicia M. Fox
Senior Case Administrator -FINRA Dispute Resolution
55 W. Monroe, Suite 2600
Chicago, IL 60603
MidwestProcessing@finra.org

RE: Darrell R. Heinen v. Garden State Securities,
et al. , FINA Arbitration No.: 24-01131

Dear Panel:

I wish to introduce myself and apologize in the same breath, which is never a great place to be in. My name is Mack Press, and just yesterday I was retained by Claimant Darrell Heinen (“Claimant”) to handle going forward and help cure all deficiencies respecting his above referenced FINRA arbitration claims against Respondents, which were left astray and unattended by the former attorney, Brandon Dei (but due to *exceptional* circumstances, described *infra*.)

Last night by way of email, I corresponded with Respondents’ counsel. I firmly apologized to him – and now to the Panel– for the neglect this case has seen on the part of Claimant’s prior counsel, Brandon Dei. However, *exceptional* circumstances occurred - circumstances that Claimant himself just became aware of and which were out of his control - that caused Mr. Dei’s inattention to motions and correspondence, and neglect in this case.

Specifically, I have been told that Mr. Die had a nervous breakdown, and then a physical breakdown, while suffering from an extremely rare and uncomfortable and painful ailment

(where a parasite from a cat hatched in his ears, and all he could hear was scratching and scratching in his head). The rampant scratching in his ears also did not allow him to sleep at all, so he began suffering from extreme insomnia and sleep deprivation. To complicate matters, I am told he did not communicate his situation to anyone else. He suffered silently; and left his legal cases unattended. By the time he was taken away, I am told he could not even understand or handle basic things. He was completely non-functional.

While I feel badly for Mr. Dei and wish him a speedy recovery, I respectfully request that the Panel does not blame Claimant under these circumstances. I have arranged to speak tomorrow morning with Respondents' counsel, Mr. Rabinowitz. As I will convey to him, and as I hold out to the Panel, the Claimant fully intends to arbitrate in good faith and in a prompt and professional manner going forward. I will also start to cure any deficiencies in the case.

In sum, I ask the Panel for some additional time to review the file, and to set the scheduled December 16, 2024 conference call to a day in the near future - if needed - pending my conversation tomorrow with Respondents' counsel, Mr. Rabinowitz.

Finally, kindly remove Mr. Brandon Lei's contact information from your file for this case and replace his contact information with mine as set forth below

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If you have any questions, please do not hesitate to contact me.

/s/ Mack Press

Mack Press, Attorney for
Claimant Darrell Heinen

Cc: Mr. Darrell Heinen, Robert Rabinowitz, Esq. (via Portal and Email)